

20 June 2019

To the Commissioners:

I am writing to comment on behalf of Advanced Environmental Monitoring, LLC (AEM), and its five subsidiary member companies (OneRain Inc., High Sierra Electronics Inc., Vieux & Associates, Forest Technology Systems Inc., and Lambrecht Meteo GmbH), regarding Docket No.19-116.

Our AEM member companies comprise a family of innovators who provide technologies and services that enable decision makers to optimally manage weather and environmental events, helping to protect communities, people, and infrastructure. Clients we have served for decades include local, regional, state, and federal agencies responsible for the safety of their communities in the United States and Canada, as well as various other countries around the globe.

The primary responsibilities of these clients focus on measuring water and weather as they relate to wildland fire, severe storms and flash flooding, dam safety, reservoir management and power production. These critical monitoring applications range from remote monitoring sites that have no power or telecommunications infrastructure but nevertheless contain high hazard dams that threaten populations below, to densely populated metropolitan areas managing real-time water distribution and power production as well as hurricanes and intense rainfall events, to western lands with massive wildfire risk and active fire management.

Most of AEM's clients use a mixture of telemetry methods to transmit and receive their environmental data in real time, sometimes for the disaster resiliency created by redundancy, and in many cases because other methods are constrained or impossible due to real world conditions. Relying on the GOES DCS downlink channel that carries data from individual monitoring sites is core to their successful operations. As a representative example, our member company Forest Technology Systems Inc. is the long-time provider of the GOES-transmitter-equipped permanent fire weather stations (~4000) and additional quick-deploy weather stations used to monitor fire risk, manage active fires, and safely guide the firefighters on their mission throughout North America and other parts of the world.

Accurate and timely GOES-transmitted information is critical to the monitoring networks described above and to our public's safety and economic security. The data provided by these monitoring sites is in many cases the only source of information for near-real-time and real-time public safety decisions.

To that end, we respectfully urge significant caution regarding Docket No. 19-116, as our own internal AEM experts, as well as critical client experts, are extremely concerned about the consequences of its roll out. We are confident that "sharing" the GOES DCS downlink band with commercial terrestrial, especially mobile, wireless users will result in degradation of data quality and loss of critical data needed for public safety, which could ultimately result in unintended and unnecessary loss of life, property or critical infrastructure.

Thank you for taking our input under consideration.

Best regards,



Rodney Smith
CEO, Advanced Environmental Monitoring
Rodney@AEMonitoring.com